

WHITFIELD & EDDY P.L.C.

RECEIVED & INSPECTED

MAY 19 2004

FCC - MAILROOM

ORIGINAL

317 Sixth Avenue, Suite 1200
Des Moines, IA 50309-4195
Telephone 515-288-6041
Facsimile 515-246-1474
www.whitfieldlaw.com

ATTORNEYS AND COUNSELORS AT LAW

Gary Gately	Thomas S. Reavely	Sally A. Reavely	Gretchen Witte Kraemer	West Des Moines:	Of Counsel:
David L. Phipps	Gary A. Norton	Angela A. Shutts	Ankeny:	John A. Templer Jr.	Harley A. Whitfield
Benjamin B. Ullem	Frank M. Grenard	Stephen E. Doohen	Mark R. Gray	Greg A. Naylor	Timothy J. Walker
Robert L. Fanter	Ron Adams	Jon Hoffmann	David D. Nelson	Maureen Roach Tobin	Wendy Carlson
Bernard L. Spaeth, Jr.	Mark V. Hanson	Thomas G. Fisher Jr.	Mt. Pleasant:	Jeffrey D. Stone	Dennis R. Thompson
William L. Fairbank	August B. Landis	Marc T. Beltrame	Philip McCormick	Stephen D. Marso	Retired:
Robert G. Bridges	G. Mark Rice	Drew J. Gentsch	Danny L. Cornell	Jeffrey D. Ewoldt	John C. Eddy
Jaki K. Samuelson	Richard J. Kirschman	Theodore C. Simms, II	Alanson K. Elgar,		A. Roger Witke
Kevin M. Reynolds	John F. Fatino	Christine C. Cownie	of Counsel		
Thomas H. Burke	Jason M. Casini	Jonathan Kramer			
Thomas Henderson	Roscoe A. Ries, Jr.	Kara M. Sinnard			
Megan M. Antenucci	J. Campbell Helton	B. MacPaul Stanfield			

Direct Line/E-Mail

558-0109

fisher@whitfieldlaw.com

Refer to our File Number

May 14, 2004

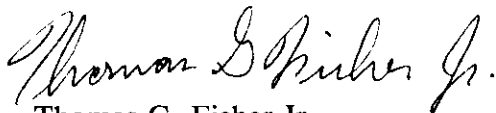
Ms. Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12 St. SW
Washington, D.C. 20554

Re: Ex Parte Communication/ CC Docket No. 95-116

Dear Ms. Dortch:

On May 13, 2004, the Rural Iowa Independent Telephone Association ("RIITA") sent the enclosed letters to William Maher, Bureau Chief of the Wireline Competition Bureau, Carol Matthey, Deputy Bureau Chief, John Muleta, Bureau Chief of the Wireless Telecommunications Bureau, and David Furth Associate Bureau Chief/Counsel. In accordance with Commission's rules 47 C.F.R. §§ 1.1200 and 1.1206, an original and one copy of each letter and this Notice are being filed with you. In addition, each letter enclosed a copy of a brochure about RIITA. Two copies of that brochure are enclosed with this letter. A copy of this Notice will be filed electronically with the Commission's Electronic Comment Filing System and with Qualex International via e-mail.

Sincerely,



Thomas G. Fisher Jr.

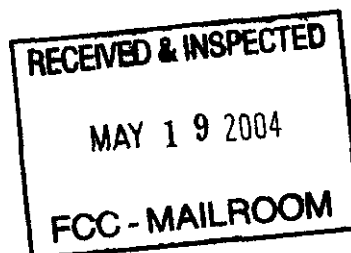
No. of Copies rec'd 011
List ABCDE

TGF



EX PARTE OR LATE FILED

1000 Walnut St., #324
Des Moines, IA 50309
888-345-1743 or 515-243-1743
FAX 515-283-1928



May 13, 2004

Mr. David Furth
Associate Bureau Chief/Counsel
Wireless Telecommunications Bureau
Federal Communications Commission
445 12 St. SW
Washington, D.C. 20554

Re: Ex Parte Communication/ CC Docket No. 95-116

Dear Mr. Furth:

The Rural Iowa Independent Telephone Association represents small independent ILECs in Iowa. We are very concerned that the FCC in its orders related to wireless number portability and in its communications with state public utility commissions do not take into consideration the economic impact of this requirement on independent telephone companies and their customers.

Iowa has approximately 150 telephone companies. About one-half of the independent telephone companies have fewer than 1200 access lines. Of the other half, the vast majority of companies serve fewer than 4000 customers. With only a very few exceptions, the wireless carriers in Iowa have neither direct connections with our members nor points of interconnection within the independents' exchanges. To the best of our ability to determine, most wireless carriers do not have points of interconnection within a reasonable proximity of many of our carriers—in some instances the closest point of interconnection is not even located within the same LATA. As a consequence, our member companies do not know where a connection can be made or what manner any ported traffic would be transported to that location, short of relying on the long-distance toll networks. Even if transport were arranged, it will place additional costs on the companies and create a need to travel long distances to reach a point of presence for each wireless carrier. Our companies further face the confusion generated by the lack of guidance as to who must arrange and pay these transportation costs.

Added to that concern is the cost of switch upgrades, service order administration and data base charges. Though all companies providing number portability face these costs, the impact is severe when those costs are spread among only a few hundred customers. Many of our rural customers already struggle to pay utility bills; these extra costs will have a direct and substantial impact on their lives. Preliminary calculations have shown that the NECA tariff could result in

increases in their monthly bills of substantial amounts. Those tariff increases don't include the transport charges that will, if the FCC places those costs on our companies, also ultimately be paid by the companies whether or not they appear in the NECA tariff.

Furthermore, our firm belief is that demand in rural Iowa for intermodal number portability is negligible. Wireless coverage is poor or non-existent in large areas of Iowa. In contrast, our companies have been on the forefront of providing our customers access to modern wireline technology. Years (in some cases, decades) before the large carriers with rural exchanges, one hundred percent of our companies installed digital switches. In the last five years, our companies have consistently outstripped the large carriers in providing access to broadband advanced telecommunications services. The "digital divide" is a myth in rural Iowa exchanges served by independent telephone companies. No FCC rule or regulatory agency required us to provide advanced telecommunications services; our companies provided those services to our communities because it was in the best interest of their communities. Notably, at the same time, large out-of-state carriers would neither make that same investment nor take the risks associated with those investments. In addition, our companies are often the most successful businesses in their communities and have provided a range of economic opportunities in our towns and rural areas and have continued to invest in rural Iowa.

In other words, our companies are willing to invest in demanded and needed technology within our state. However, the added cost of this unnecessary service—with no real demand—is a waste of the limited resources in rural Iowa. Iowa has more small telephone companies than any other state in the country. This situation evolved from communities, cooperatives, and small rural companies providing high quality telephone services along with high quality personal service to our communities. The rural difference has served Iowa well and is threatened by this requirement to provide unneeded and unwanted services.

We urge you in your decisions, and in your communications with the Iowa Utilities Board, to consider the issues related to rural telecommunications provision. We ask the FCC to consider the additional costs being placed on rural customers for a service for which they show little or no interest. We encourage you to treat our companies differently. Rural Iowa is different and rules generally applicable to large urban carriers may not operate in the best interests of our customers. We implore you to consider the Iowa difference.

Sincerely,

A handwritten signature in cursive script, appearing to read "Judy Pletcher".

Judy Pletcher
Executive Director



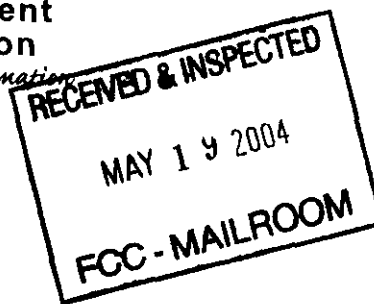
RIITA

**Rural Iowa Independent
Telephone Association**

Communications - The Successful Exchange of Information

EX PARTE OR LATE FILED

1000 Walnut St., #324
Des Moines, IA 50309
888-345-1743 or 515-243-1743
FAX 515-283-1928



May 13, 2004

Ms. Carol Matthey
Deputy Bureau Chief
Wireline Competition Bureau
Federal Communications Commission
445 12 St. SW
Washington, D.C. 20554

Re: Ex Parte Communication/ CC Docket No. 95-116

Dear Ms. Matthey:

The Rural Iowa Independent Telephone Association represents small independent ILECs in Iowa. We are very concerned that the FCC in its orders related to wireless number portability and in its communications with state public utility commissions do not take into consideration the economic impact of this requirement on independent telephone companies and their customers.

Iowa has approximately 150 telephone companies. About one-half of the independent telephone companies have fewer than 1200 access lines. Of the other half, the vast majority of companies serve fewer than 4000 customers. With only a very few exceptions, the wireless carriers in Iowa have neither direct connections with our members nor points of interconnection within the independents' exchanges. To the best of our ability to determine, most wireless carriers do not have points of interconnection within a reasonable proximity of many of our carriers—in some instances the closest point of interconnection is not even located within the same LATA. As a consequence, our member companies do not know where a connection can be made or what manner any ported traffic would be transported to that location, short of relying on the long-distance toll networks. Even if transport were arranged, it will place additional costs on the companies and create a need to travel long distances to reach a point of presence for each wireless carrier. Our companies further face the confusion generated by the lack of guidance as to who must arrange and pay these transportation costs.

Added to that concern is the cost of switch upgrades, service order administration and data base charges. Though all companies providing number portability face these costs, the impact is severe when those costs are spread among only a few hundred customers. Many of our rural customers already struggle to pay utility bills; these extra costs will have a direct and substantial impact on their lives. Preliminary calculations have shown that the NECA tariff could result in

increases in their monthly bills of substantial amounts. Those tariff increases don't include the transport charges that will, if the FCC places those costs on our companies, also ultimately be paid by the companies whether or not they appear in the NECA tariff.

Furthermore, our firm belief is that demand in rural Iowa for intermodal number portability is negligible. Wireless coverage is poor or non-existent in large areas of Iowa. In contrast, our companies have been on the forefront of providing our customers access to modern wireline technology. Years (in some cases, decades) before the large carriers with rural exchanges, one hundred percent of our companies installed digital switches. In the last five years, our companies have consistently outstripped the large carriers in providing access to broadband advanced telecommunications services. The "digital divide" is a myth in rural Iowa exchanges served by independent telephone companies. No FCC rule or regulatory agency required us to provide advanced telecommunications services; our companies provided those services to our communities because it was in the best interest of their communities. Notably, at the same time, large out-of-state carriers would neither make that same investment nor take the risks associated with those investments. In addition, our companies are often the most successful businesses in their communities and have provided a range of economic opportunities in our towns and rural areas and have continued to invest in rural Iowa.

In other words, our companies are willing to invest in demanded and needed technology within our state. However, the added cost of this unnecessary service—with no real demand—is a waste of the limited resources in rural Iowa. Iowa has more small telephone companies than any other state in the country. This situation evolved from communities, cooperatives, and small rural companies providing high quality telephone services along with high quality personal service to our communities. The rural difference has served Iowa well and is threatened by this requirement to provide unneeded and unwanted services.

We urge you in your decisions, and in your communications with the Iowa Utilities Board, to consider the issues related to rural telecommunications provision. We ask the FCC to consider the additional costs being placed on rural customers for a service for which they show little or no interest. We encourage you to treat our companies differently. Rural Iowa is different and rules generally applicable to large urban carriers may not operate in the best interests of our customers. We implore you to consider the Iowa difference.

Sincerely,

A handwritten signature in cursive script, appearing to read "Judy Pletcher".

Judy Pletcher
Executive Director



RIITA

**Rural Iowa Independent
Telephone Association**

Communications - The Successful Exchange of Information

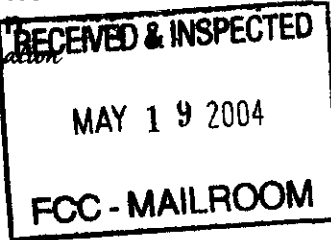
EX PARTF OR LATE FILED

1000 Walnut St., #324

Des Moines, IA 50309

888-345-1743 or 515-243-1743

FAX 515-283-1928



May 13, 2004

Mr. William Maher
Bureau Chief
Federal Communications Commission
445 12 St. SW
Washington, D.C. 20554

Re: Ex Parte Communication/ CC Docket No. 95-116

Dear Mr. Maher:

The Rural Iowa Independent Telephone Association represents small independent ILECs in Iowa. We are very concerned that the FCC in its orders related to wireless number portability and in its communications with state public utility commissions do not take into consideration the economic impact of this requirement on independent telephone companies and their customers.

Iowa has approximately 150 telephone companies. About one-half of the independent telephone companies have fewer than 1200 access lines. Of the other half, the vast majority of companies serve fewer than 4000 customers. With only a very few exceptions, the wireless carriers in Iowa have neither direct connections with our members nor points of interconnection within the independents' exchanges. To the best of our ability to determine, most wireless carriers do not have points of interconnection within a reasonable proximity of many of our carriers—in some instances the closest point of interconnection is not even located within the same LATA. As a consequence, our member companies do not know where a connection can be made or what manner any ported traffic would be transported to that location, short of relying on the long-distance toll networks. Even if transport were arranged, it will place additional costs on the companies and create a need to travel long distances to reach a point of presence for each wireless carrier. Our companies further face the confusion generated by the lack of guidance as to who must arrange and pay these transportation costs.

Added to that concern is the cost of switch upgrades, service order administration and data base charges. Though all companies providing number portability face these costs, the impact is severe when those costs are spread among only a few hundred customers. Many of our rural customers already struggle to pay utility bills; these extra costs will have a direct and substantial impact on their lives. Preliminary calculations have shown that the NECA tariff could result in increases in their monthly bills of substantial amounts. Those tariff increases don't include the


transport charges that will, if the FCC places those costs on our companies, also ultimately be paid by the companies whether or not they appear in the NECA tariff.

Furthermore, our firm belief is that demand in rural Iowa for intermodal number portability is negligible. Wireless coverage is poor or non-existent in large areas of Iowa. In contrast, our companies have been on the forefront of providing our customers access to modern wireline technology. Years (in some cases, decades) before the large carriers with rural exchanges, one hundred percent of our companies installed digital switches. In the last five years, our companies have consistently outstripped the large carriers in providing access to broadband advanced telecommunications services. The “digital divide” is a myth in rural Iowa exchanges served by independent telephone companies. No FCC rule or regulatory agency required us to provide advanced telecommunications services; our companies provided those services to our communities because it was in the best interest of their communities. Notably, at the same time, large out-of-state carriers would neither make that same investment nor take the risks associated with those investments. In addition, our companies are often the most successful businesses in their communities and have provided a range of economic opportunities in our towns and rural areas and have continued to invest in rural Iowa.

In other words, our companies are willing to invest in demanded and needed technology within our state. However, the added cost of this unnecessary service—with no real demand—is a waste of the limited resources in rural Iowa. Iowa has more small telephone companies than any other state in the country. This situation evolved from communities, cooperatives, and small rural companies providing high quality telephone services along with high quality personal service to our communities. The rural difference has served Iowa well and is threatened by this requirement to provide unneeded and unwanted services.

We urge you in your decisions, and in your communications with the Iowa Utilities Board, to consider the issues related to rural telecommunications provision. We ask the FCC to consider the additional costs being placed on rural customers for a service for which they show little or no interest. We encourage you to treat our companies differently. Rural Iowa is different and rules generally applicable to large urban carriers may not operate in the best interests of our customers. We implore you to consider the Iowa difference.

Sincerely,



Judy Fletcher
Executive Director


RIITA
**Rural Iowa Independent
Telephone Association**
Communications - The Successful Exchange of Information
RECEIVED & INSPECTED
MAY 19 2004
FCC - MAILROOM

1000 Walnut St., #324

Des Moines, IA 50309

888-345-1743 or 515-243-1743

FAX 515-283-1928

May 13, 2004

Mr. John Muleta
Bureau Chief
Federal Communications Commission
445 12 St. SW
Washington, D.C. 20554

Re: Ex Parte Communication/ CC Docket No. 95-116

Dear Mr. Muleta:

The Rural Iowa Independent Telephone Association represents small independent ILECs in Iowa. We are very concerned that the FCC in its orders related to wireless number portability and in its communications with state public utility commissions do not take into consideration the economic impact of this requirement on independent telephone companies and their customers.

Iowa has approximately 150 telephone companies. About one-half of the independent telephone companies have fewer than 1200 access lines. Of the other half, the vast majority of companies serve fewer than 4000 customers. With only a very few exceptions, the wireless carriers in Iowa have neither direct connections with our members nor points of interconnection within the independents' exchanges. To the best of our ability to determine, most wireless carriers do not have points of interconnection within a reasonable proximity of many of our carriers—in some instances the closest point of interconnection is not even located within the same LATA. As a consequence, our member companies do not know where a connection can be made or what manner any ported traffic would be transported to that location, short of relying on the long-distance toll networks. Even if transport were arranged, it will place additional costs on the companies and create a need to travel long distances to reach a point of presence for each wireless carrier. Our companies further face the confusion generated by the lack of guidance as to who must arrange and pay these transportation costs.

Added to that concern is the cost of switch upgrades, service order administration and data base charges. Though all companies providing number portability face these costs, the impact is severe when those costs are spread among only a few hundred customers. Many of our rural customers already struggle to pay utility bills; these extra costs will have a direct and substantial impact on their lives. Preliminary calculations have shown that the NECA tariff could result in increases in their monthly bills of substantial amounts. Those tariff increases don't include the

transport charges that will, if the FCC places those costs on our companies, also ultimately be paid by the companies whether or not they appear in the NECA tariff.

Furthermore, our firm belief is that demand in rural Iowa for intermodal number portability is negligible. Wireless coverage is poor or non-existent in large areas of Iowa. In contrast, our companies have been on the forefront of providing our customers access to modern wireline technology. Years (in some cases, decades) before the large carriers with rural exchanges, one hundred percent of our companies installed digital switches. In the last five years, our companies have consistently outstripped the large carriers in providing access to broadband advanced telecommunications services. The "digital divide" is a myth in rural Iowa exchanges served by independent telephone companies. No FCC rule or regulatory agency required us to provide advanced telecommunications services; our companies provided those services to our communities because it was in the best interest of their communities. Notably, at the same time, large out-of-state carriers would neither make that same investment nor take the risks associated with those investments. In addition, our companies are often the most successful businesses in their communities and have provided a range of economic opportunities in our towns and rural areas and have continued to invest in rural Iowa.

In other words, our companies are willing to invest in demanded and needed technology within our state. However, the added cost of this unnecessary service—with no real demand—is a waste of the limited resources in rural Iowa. Iowa has more small telephone companies than any other state in the country. This situation evolved from communities, cooperatives, and small rural companies providing high quality telephone services along with high quality personal service to our communities. The rural difference has served Iowa well and is threatened by this requirement to provide unneeded and unwanted services.

We urge you in your decisions, and in your communications with the Iowa Utilities Board, to consider the issues related to rural telecommunications provision. We ask the FCC to consider the additional costs being placed on rural customers for a service for which they show little or no interest. We encourage you to treat our companies differently. Rural Iowa is different and rules generally applicable to large urban carriers may not operate in the best interests of our customers. We implore you to consider the Iowa difference.

Sincerely,

A handwritten signature in cursive script, reading "Judy Pletcher".

Judy Pletcher
Executive Director